

STAT
MEMORANDUM FOR: []

Deputy General Counsel

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FROM: []

Chairman, Agency Financial Disclosure Review Panel

SUBJECT:

Supplying Prior Year Financial Disclosure Statements
to Agency Financial Disclosure Review Panel Members

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1. On 23 April 1985, the Agency Financial Disclosure Review Panel received a very informative briefing from two representatives from the Office of Government Ethics (OGE). At this briefing, which was arranged by [] from your office, the OGE representatives advised that for a designated Agency ethics official or designee to properly review the prior Financial Disclosure Statement (FDS), for comparison. We have not been following this practice, although we do, upon request, provide a copy of the FDS to the reporting SIS officer or the appropriate panel member. Such requests are rare.

2. Before initiating what would be a rather significant departure from past administrative practice by supplying a copy of the previous FDS to reviewing panel members and directing these officials to refer to the prior forms in conducting the current review, we would like your opinion as to whether you feel it is necessary.

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[]
We should () should not () supply a copy of the previous FDS to the reviewing panel member and direct the panel member to refer to the previous FDS in reviewing the current FDS.

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[] _____
Date _____

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